



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 25, 1984

OFFICE OF
THE ADMINISTRATOR

Mr. Alvin L. Alm
Deputy Administrator
U.S. Environmental Protection
Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Alm:

The Science Advisory Board (SAB) is frequently requested by the Agency to evaluate the scientific data and methods that lead to a statement of hazard or risk to human health and the environment as the result of exposure to an individual compound or class of compound. The information submitted to the SAB includes the available experimental animal test results, human clinical data, epidemiological studies, information relating to the mechanisms of pollutant interaction and a discussion of procedures employed in estimating the likelihood of the occurrence of effects. From this body of evidence the Agency generates quantitative risk estimates or makes qualitative conclusions about health and welfare effects; both kinds of statements become key scientific bases for making risk management decisions.

The Board is concerned that a significant factor in the risk evaluation equation--exposure assessment--is not uniformly submitted for its review, along with the aforementioned data bases, by the various program offices. It is increasingly recognized, by scientists and policy makers, that a risk assessment should include both an assessment of the toxicity data base and the available exposure information, and that efforts ought to be made to integrate these two data sets to calculate risk estimates.


With this in mind, the Science Advisory Board makes two official requests to you and to the Agency. These include:

- 1) that, as a routine matter, analyses of toxicity and potency submitted for SAB review be accompanied by the available, non-confidential exposure assessment data and analyses of major importance to the Agency.

2) that, such exposure assessments include a discussion of the methods used by the Agency for estimating exposures and that the ranges of exposure estimates generated by such methods be presented along with the degree to which they influence the Agency's evaluation of risk to human health and/or the environment.

The Board looks forward to working with the Agency to continue to improve the use of risk assessment in the decision making process.

Sincerely,


Norton Nelson
Chairman
Executive Committee
Science Advisory Board